

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**RAS Citron, LLC**  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone Number 973-575-0707  
Attorneys For Secured Creditor  
MTGLQ Investors, LP  
  
Shauna Deluca, Esq. (SD-8248)

In Re:

**Nana Opoku-Ware**

*fka* **John Owusu**

*fka* **John Owusu-Ware,**  
**Debtor.**

Case No.: 19-25519-JKS

Chapter: 13

Judge: John K. Sherwood

#### **NOTICE OF MORTGAGE FORBEARANCE**

The undersigned is the Attorney for Creditor MTGLQ Investors, LP. On or about July 27, 2020, the Creditor was advised that the Debtor(s)' mortgage loan ending in 0212 ("subject mortgage loan"), secured by real property described as 28-30 Clinton Pl, Newark, NJ 07103 has been impacted by COVID-19. Pursuant to State and/or Federal guidelines, a forbearance has been offered, the terms of which are as follows:

1. The parties agree to a forbearance period of 90 days and have elected to not tender mortgage payments to Creditor that would come due on the subject mortgage loan starting 08/01/2020 through 10/01/2020.
2. Debtor(s) will resume mortgage payments beginning 11/01/2020 and will be required to cure the delinquency created by the forbearance period ("forbearance arrears").
3. The payment amount currently is \$2,354.36.
4. The Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. Creditor does not waive its rights under the terms of the note and

mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

5. The Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.
6. The Debtor(s) do not waive any rights upon expiration of the forbearance period. Prior to the expiration of the forbearance period, however, the Debtor(s) must take the following affirmative steps to address the status of the subject mortgage loan including, but not limited to: (a) bringing the account post-petition current; (b) requesting extension of the forbearance period; (c) applying for loss mitigation; and/or (d) amending the Chapter 13 Plan.
7. Any objection to this Notice must be filed and served not later than 14 days after the filing of the Notice. The Court may conduct a hearing on the objection.

**This Notice is intended to disclose a temporary forbearance of the Debtor(s)' obligation to remit post-petition payments for the forbearance period. Nothing within this Notice should be construed to alter any rights, duties, or deadlines that are not related to the remittance of post-petition mortgage payments.**

Dated: September 22, 2020

**RAS Citron, LLC**  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone Number 973-575-0707  
Attorneys For Secured Creditor  
By: /s/ Shauna Deluca  
Shauna Deluca, Esq.  
Bar ID: SD-8248  
Email: sdeluca@rasflaw.com

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**CERTIFICATION OF SERVICE**

1. I, Shauna Deluca, represent MTGLQ Investors, LP, in this matter.
2. On September 22, 2020, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Notice of Mortgage Forbearance.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated

Dated: September 22, 2020

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Attorneys For Secured Creditor  
By: /s/ Shauna Deluca  
Shauna Deluca, Esq.  
Bar ID: SD-8248  
Email: sdeluca@rasflaw.com

Name and Address of Party Served	Relationship of Party to the	Mode of Service
	Case	
Herbert B. Raymond 7 Glenwood Ave Suite #408 4th Floor East Orange, NJ 07017	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
Nana Opoku-Ware 123-125 Division Street Elizabeth, NJ 07201	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)